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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re:)	
)	Chapter 9
TULARE LOCAL HEALTHCARE)	Case No.: 17-13797
DISTRICT dba TULARE REGIONAL)	
MEDICAL CENTER,)	DC No.: JAB-1
)	
Debtor.)	NOTICE OF MOTION FOR
)	RELIEF FROM AUTOMATIC
)	STAY TO ALLOW STATE
)	ACTION TO PROCEED UNDER
)	11 U.S.C. § 362
)	
)	(Declaration of James Bulger with
)	supporting exhibits filed concurrently)
)	
)	DATE: November 30, 2017
)	TIME: 9:30 a.m.
)	JUDGE: Hon. Rene Lastreto II
)	PLACE: 2500 Tulare Street
)	Fresno, CA 93721
)	Dept. B Courtroom 13, 5 th Fr

TO THE COURT, THE U.S. TRUSTEE, THE DEBTOR, AND THEIR
ATTORNEYS OF RECORD:

1 PLEASE TAKE NOTICE that on November 30, 2017 at 9:30 a.m. before the
2 Honorable Rene Lastreto II in of the above-captioned Court, located at 2500 Tulare
3 Street, Fresno, CA 93721, Dept. B, Courtroom 13, 5th Floor or as soon thereafter as
4 counsel may be heard by the Court, Movants JOHN TORREZ III and BERNADETTE
5 TORREZ ("Movants") will move the Court for an Order lifting the automatic stay
6 pursuant to §362 of the Bankruptcy Code for good cause shown.

7 This Motion and supporting papers are being served on the interested parties
8 pursuant to sections 362 and 901 of the Bankruptcy Code.

9 Pursuant to LBR-9014 no party in interest shall be required to file written
10 opposition to the motion. Opposition, if any, shall be presented at the hearing.

11 Parties in interest can determine whether the matter has been resolved without oral
12 argument or whether the court has issued a tentative ruling, and can view [any] pre-
13 hearing depositions by checking the Court's website at www.caeb.uscourts.gov after 4:00
14 p.m. the day before the hearing. Parties appearing telephonically must view the pre-
15 hearing dispositions prior to the hearing.

16 This Motion will be based upon §362 of the Bankruptcy Code; Local Rule 4001-1;
17 the attached Memorandum of Points and Authorities; the attached Declaration of James
18 Bulger; and such further oral and documentary evidence as may be presented at the
19 hearing.

20 DATED: November 13, 2017

HEIMBERG BARR, LLP

21 BY: 

22 JAMES BULGER

23 Attorneys for Movants JOHN TORREZ III and
24 BERNADETTE TORREZ
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